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**FILED**

NOV 10 2015

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL ROSENTHAL,

Defendant.

No. CR 14-648 VC

STIPULATION AND [PROPOSED]  
ORDER TEMPORARILY MODIFYING  
CONDITIONS OF RELEASE TO ALLOW  
FOR OUT-OF-DISTRICT TRAVEL

**STIPULATION**

Defendant Daniel Rosenthal now moves this Court to temporarily modify his bond conditions, allowing him to travel to West Palm Beach, Florida to visit his grandfather, who was recently diagnosed with a terminal illness and is not expected to live long. Mr. Rosenthal's bond conditions currently allow for travel within the Northern and Central Districts of California only.

Government counsel has been contacted about the request by defense counsel, and has no objection to the proposed modification.

The defendant is not currently being supervised by Pretrial Services – however, Pretrial Services has agreed to monitor the defendant's travel for the aforementioned 9 day period to monitor his location and whereabouts. Accordingly, U.S. Pretrial Services Officer Katrina Chu

1 has reviewed this stipulation, and has no objection to its contents.

2 The proposed modification would allow Mr. Rosenthal to travel from his home in Orange  
 3 County, California to West Palm Beach, Florida on Friday, November 13 2015 by airplane. His  
 4 father and surety, Rick Rosenthal, will already be in Florida at the time of the defendant's arrival,  
 5 and they will be staying together over the weekend. Mr. Rosenthal intends to remain in Florida  
 6 during the week of November 16 to assist his grandfather with medical appointments and  
 7 household tasks, as his father Rick needs to return home to work. Mr. Daniel Rosenthal intends  
 8 to return to the Central District of California on November 22, 2015 by airplane. At all times  
 9 while out of the Central District and not traveling, Mr. Rosenthal will be located at his  
 10 grandparents' residence, which is 10351 Utopia Circle North, Boynton Beach, Florida 33437.  
 11 Moreover, Mr. Rosenthal agrees to give U.S. Pretrial Services a copy of his itinerary and provide  
 12 a landline number where he will be staying to U.S. Pretrial Services in San Francisco, California.

13  
 14 IT IS SO STIPULATED.

15  
 16 Dated: November 9, 2015

17 \_\_\_\_\_/s/\_\_\_\_\_  
 ELIZABETH M. FALK  
 Assistant Federal Public Defender

18  
 19 Dated: November 9, 2015

20 \_\_\_\_\_/s/\_\_\_\_\_  
 DENISE BARTON  
 Assistant United States Attorney

21  
 22 **[PROPOSED] ORDER**

23 The defendant's bond is hereby temporarily modified as follows: Defendant may leave the  
 24 Central District of California on November 13, 2015 to travel to West Palm Beach, Florida. He  
 25 is to provide U.S. Pretrial Services with a copy of his plane itinerary and a landline where he may  
 26 be reached while in Florida. He is to reside at the above-referenced address at all times while in

1 Florida. Defendant is to return to this District on November 22, 2015. He shall then remain in  
2 the Northern and Central Districts of California. All remaining terms and conditions of the bond  
3 remain in full force and effect.

4 IT IS SO ORDERED.

5 Dated

1170-15

6   
HON. MARIA ELENA-JAMES  
UNITED STATES MAGISTRATE JUDGE